

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

## REMARKS

### Request for Reconsideration, Informal Matters, Claims Pending

The final Office action mailed on 8 February 2006 has been considered carefully. Reconsideration of the claimed invention in view of the amendments above and the discussion below is respectfully requested.

Claims 1-5 and 7-21 are pending.

### Response to Rejection Under 35 U.S.C. 112, First Paragraph

#### Rejection Summary

Claim 19 stand rejected under 35 U.S.C. 112, first paragraph for allegedly failing to enable the claimed subject matter and failure to prove possession thereof at the time of filing.

#### Discussion

Claim 19 depends from Claim 10, which is drawn generally to a method in a packet server that negotiates with a radio communications network for a radio resource transfer for a handover target identified by a mobile wireless communications device. On page 6, line 12 – page 7, line 3, the original specification discloses that the handover decision may be made by the mobile terminal, or by the network, or by the packet server. Claim 19 covers the case where the handover decision is made by an entity other than the packet server, for example, by the mobile terminal. Thus according to Claim

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

19, the packet server negotiates but does not make the handover decision. Page 7, lines 4-11 of the specification merely indicates that, in at least one embodiment, the handover decision is determined by the packet server before the packet server negotiates.

Since entities other than the packet server may make the handover decision, the packet server may negotiate with the radio communications network "... without making a handover decision for the mobile wireless communications device", as recited in Claim 19, after determining that handover will occur. For example, the wireless terminal may decide to handover and communicate its handover decision to the packet server, whereupon the packet server then negotiates with the radio communications network. Thus Claim 19 is fully supported by the original specification. Kindly withdraw the rejection under 35 USC 112.

### Allowability of Claims Over Coskun

#### Rejection Summary

Claims 1-17 stand rejected under 35 USC 102(e) for anticipation by U.S. Publication No. 2002/0082018 (Coskun).

#### Allowability of Claim 1

Regarding Claim 1, contrary to the Examiner's assertion, Coskun fails to disclose or suggest an

... method in a mobile communications device, the method comprising:  
participating in a packet session;

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

identifying a handover target in the mobile communications device;  
sending handover information for the identified handover target to a packet  
server while in the packet session;  
receiving radio resource information for the identified handover target from  
the packet server in response to sending the handover information to the packet  
server.

Coskun discloses a wireless communication network having a  
computing apparatus that allocates network resources to a mobile terminal.  
More particularly, in FIG. 2 of Coskun, the mobile terminal (MT) sends pilot  
signals measurements (PSM) to a RLA/RRM (32), which forwards the  
measurements to HM/PSM (34). Coskun, para. [0037].

In Coskun, the HM/PSM (34) determines whether a handoff is  
required and, if so, the HM/PSM (34) requests that a signaling channel be  
allocated to the MT. Coskun, para. [0038]. Thus Coskun does not disclose  
"...identifying a handover target in the mobile communications device..."  
since the HM/PSM (34) in the network of Coskun performs this function based  
on the PSM received from the MT. Claim 1 is thus patentably distinguished  
over Coskun.

#### Allowability of Claim 8

Regarding Claim 8, Coskun fails to disclose or suggest in  
combination with the limitations of Claim 1,

... identifying a plurality of potential handover targets to the packet  
server,  
receiving radio resource information from the packet server for at least  
one of the handover targets identified.

Coskun merely sends pilot signal measurements (PSM) to the network, which  
determines whether to and when to handover the MT to a new cell. The MT in

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

Coskun does not identify one or more handoff targets. Claim 8 is thus further patentably distinguished over Coskun.

#### Allowability of Claim 10

Regarding Claim 10, Coskun fails to disclose or suggest an

... method in a packet server connected to a communications network, the method comprising:  
receiving information from a mobile wireless communications device identifying a handover target;  
negotiating with a radio communications network for a radio resource transfer for the handover target identified by the mobile wireless communications device,  
sending, from the packet server, radio resource information for the handover target identified to the mobile wireless communications device.

Coskun discloses a wireless communication network having a computing apparatus that allocates network resources to a mobile terminal. More particularly, in FIG. 2 of Coskun, the mobile terminal (MT) sends pilot signals measurements (PSM) to a RLA/RRM (32), which forwards the measurements to HM/PSM (34). Coskun, para. [0037]. In Coskun, the HM/PSM (34) determines whether a handoff is required and, if so, the HM/PSM (34) requests that a signaling channel be allocated to the MT. Coskun, para. [0038]. In Coskun, the network does not receive "... information from a mobile wireless communications device identifying a handover target ..." since the HM/PSM (34) in the network of Coskun performs this function based on the PSM received from the MT. Claim 10 is thus patentably distinguished over Coskun.

KOTZIN ET AL.,  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

### Allowability of Claim 13

Regarding Claim 13, Coskun fails to disclose or suggest in combination with the limitations of Claim 10,

... receiving handover information from the mobile wireless communications device includes receiving a plurality of handover targets identified by the mobile wireless communications device,  
sending radio resource information to the mobile wireless communications device for at least one of the handover targets identified by the mobile wireless communications device.

Coskun merely sends pilot signal measurements (PSM) to the network, which determines whether to and when to handover the MT to a new cell. The MT in Coskun does not identify one or more handoff targets. Claim 13 is thus further patentably distinguished over Coskun.

### Allowability of Claim 15

Regarding Claim 15, contrary to the Examiner's assertion, Coskun fails to disclose or suggest an

... method in a mobile communications device in a packet session, the method comprising:  
deciding to handover to a target cell;  
sending handover information for the target cell to a packet server during a packet session;  
receiving radio resource information from the packet server for the target cell before handing over to the target cell.

Coskun discloses a wireless communication network having a computing apparatus that allocates network resources to a mobile terminal. More particularly, in FIG. 2 of Coskun, the mobile terminal (MT) sends pilot

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

signals measurements (PSM) to a RLA/RRM (32), which forwards the measurements to HM/PSM (34). Coskun, para. [0037]. In Coskun, the HM/PSM (34) determines whether a handoff is required and, if so, the HM/PSM (34) requests that a signaling channel be allocated to the MT. Coskun, para. [0038]. Thus Coskun does not disclose "... deciding to handover to a target cell [and] sending handover information for the target cell to a packet server during a packet session ..." in a mobile terminal since, in Coskun, the HM/PSM (34) in the network of Coskun performs this function based on the PSM provided by the MT. Claim 15 is thus patentably distinguished over Coskun.

#### Allowability of Claim 18

Regarding Claim 8, Coskun fails to disclose or suggest in combination with the limitations of Claim 1,

... making a handover decision in the mobile communications device.

In Coskun, the HM/PSM (34) in the network makes the handover decision. Claim 18 is thus further patentably distinguished over Coskun.

#### Allowability of Claim 19

Regarding Claim 19, Coskun fails to disclose or suggest in combination with the limitations of Claim 10,

... negotiating with the radio communications network without making a handover decision for the mobile wireless communications device.

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

In Coskun, the HM/PSM (34) in the network makes the handover decision.  
Claim 19 is thus further patentably distinguished over Coskun.

Allowability of Claim 20

Regarding Claim 20, contrary to the Examiner's assertion, Coskun fails to disclose or suggest an

... method in a wireless communications network entity, the method comprising:  
receiving handover information from a mobile wireless communications device identifying a potential handover target;  
communicating handover information to the potential handover target before the mobile wireless communications device handover to the potential handover target.

Coskun discloses a wireless communication network having a computing apparatus that allocates network resources to a mobile terminal. More particularly, in FIG. 2 of Coskun, the mobile terminal (MT) sends pilot signals measurements (PSM) to a RLA/RRM (32), which forwards the measurements to HM/PSM (34). Coskun, para. [0037]. In Coskun, the HM/PSM (34) determines whether a handoff is required and, if so, the HM/PSM (34) requests that a signaling channel be allocated to the MT. Coskun, para. [0038]. Thus Coskun does not disclose "...receiving handover information from a mobile wireless communications device identifying a potential handover target; communicating handover information to the potential handover target before the mobile wireless communications device handover to the potential handover target..." in a mobile terminal since, in Coskun, the HM/PSM (34) in the network of Coskun performs this function

KOTZIN ET AL.  
"Handover During Packet Session in Wireless  
Communication Networks and Methods"  
Atty. Docket No. CS23254RA

Appl. No. 10/647,410  
Confirm. No. 2657  
Examiner J. Stein  
Art Unit 2685

based on the PSM provided by the MT. Claim 20 is thus patentably distinguished over Coskun.

**Prayer For Relief**

In view of any amendments and the discussion above, the Claims of the present application are in condition for allowance. Kindly withdraw any rejections and objections and allow this application to issue as a United States Patent without further delay.

Respectfully submitted,



ROLAND K. BOWLER II 29 MAR. 2006  
REG. NO. 33,477

MOTOROLA, INC.  
INTELLECTUAL PROPERTY DEPT. (RKB)  
600 NORTH U.S. HIGHWAY 45, AN475  
LIBERTYVILLE, ILLINOIS 60048

TELEPHONE NO. (847) 523-3978  
FACSIMILE NO. (847) 523-2350